

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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GARY KOOPMANN, TIMOTHY KIDD and  
VICTOR PIRNIK, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff(s),

v.

FIAT CHRYSLER AUTOMOBILES N.V.,  
RONALD ISELI AND ALLESANDRO  
BALDI, AS CO-EXECUTORS FOR THE  
ESTATE OF SERGIO MARCHIONNE,  
RICHARD K. PALMER, SCOTT  
KUNSELMAN, MICHAEL DAHL, STEVE  
MAZURE, and ROBERT E. LEE,

Defendants.

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**Civ. Action No: 15-cv-07199-JMF**

**CLASS ACTION**

**PLAINTIFFS' NOTICE OF  
MOTION FOR SPOILIATION  
SANCTIONS**

**PLEASE TAKE NOTICE**, that upon the accompanying Memorandum of Law in Support of their Motion for Spoliation Sanctions, dated January 4, 2019, the accompanying Declaration of Jonathan Stern, dated January 4, 2019, and the exhibits attached thereto, and all prior papers and proceedings herein, Class Representatives Gary Koopmann, Timothy Kidd and Victor Pirnik, through their undersigned attorneys, will move this Court, before the Honorable Jesse M. Furman, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and a time designated by the Court, for an Order imposing spoliation sanctions for Defendants' failure to preserve documents relevant to the litigation.

Dated: January 4, 2019

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

/s/ Jonathan Stern

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